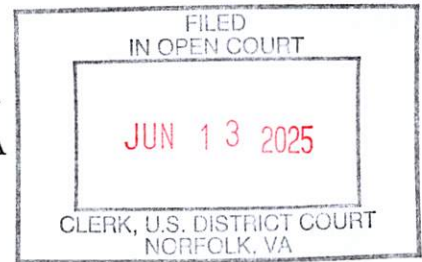


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



UNITED STATES OF AMERICA

v.

DOMINIC NATHANIEL TORRES,

Defendant.

Criminal No. 2:25-cr-10

**STATEMENT OF FACTS**

The United States and the defendant, Dominic Nathaniel Torres (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On July 8, 2024, a witness reported to Naval Criminal Investigative Service (NCIS) that the defendant was communicating with minors in a sexually explicit manner using messaging applications on his cellular phone. The witness provided NCIS with images showing the defendant's cellular phone messages with the suspected minors, which also contained suspected Child Sexually Abusive Material (CSAM.)

2. NCIS reviewed the images of the defendant's messages provided by the witness. A description of the images are as follows:

- a. Message with (XXX) XXX-4771, who identified themselves as being "15 next month", the defendant replied that he was "15 almost 16." The two continued to exchange messages, when the defendant stated, "lol I mean I can buy condoms tn, ur only like 40 mins from me." The user later responded, "You[re] only wanting to hang out with me to have sex w me

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that's crazy." The defendant then asked the user, "jus lemme touch u fr."

- b. Message with (XXX) XXX-4383, who identified themselves as 16 years old, the defendant replied "I luv younger tbh." The defendant initiated the conversation by stating "heyy cutie u got nice tits" and "my friend told me about you." The defendant then requested additional nude images of the user's breasts, and stated, "he showed us ur pussy" (referencing his friend) and "thats a pretty pussy fr."
- c. Message with (XXX) XXX-5104, who identified themselves as 16 years old, the defendant responded he was 19 and stated, "just don't tell."
- d. Message with MINOR VICTIM 1, who identified themselves as 16 years old, the defendant asked the user, "u said u hadn't gotten head before??" MINOR VICTIM 1 replied, "yea I haven't only frm youuu." The defendant then stated that he wanted to "make a movie" with her.
- e. Message with MINOR VICTIM 2, who identified themselves as 14 years old, the defendant asks "u got more for me?" MINOR VICTIM 2 then sent an image of female's breasts in a bra, which the defendant replies "ur gonna have to take it off cus I got cum for you". MINOR VICTIM 2 then sends an image of a female nude from the waist down sitting on the penis of a male nude from the waist down, with the message "aye my friend sent me a video of you and her fucking." MINOR VICTIM 2 later sends images of a nude suspected pubescent female in a bathtub with her breast and vagina exposed, and an image of a suspected pubescent female's vagina. The defendant then shares the images to the defendant's email account

XXXXXXXXXXXX@gmail.com.

- f. Message with (XXX) XXX-7642, who identified themselves as 16 years old, the defendant sends an image of a hand on a penis and stated, "i wanna stuff it inside that pussy fr". The defendant then states "u gotta fat ass fr, let me see u spread out for me :3" to which the user replies "That's all you want from me \*sad emoji\*".
- g. Message with MINOR VICTIM 3, who identified themselves as 12 years old, but then stated they were 14, the defendant asks "so no titty pic for da birthday boy \*sad emoji\*." The defendant later asks, "let me get more pics of youuu".
- h. Message with MINOR VICTIM 4, who identified themselves as 15 years old, the defendant replies that "he just turned 17." The defendant further states "u need more pics of u" and "UR MAKING MY PP HARD".

3. The defendant communicated with the suspected minors by means of text message, and the use of social media messaging applications, including: PNK, Yubo, Wizz, and Snapchat.

4. On December 6, 2024, NCIS identified MINOR VICTIM 1, a 16-year-old female, who resides within the Eastern District of Virginia. The defendant saved MINOR VICTIM 1 in his phone as "EM3 XXXX", EM3 is a military rate in the United States Navy for an Electricians Mate third class petty officer.

5. The defendant initially contacted MINOR VICTIM 1 on the social media messaging application "PNK", where the defendant provided his age as 17 years old. MINOR VICTIM 1 stated that she told the defendant she was 16 years old, both verbally and by text message.

6. As background, PNK is a social networking application where users swipe to find new similarly aged friends. A community is available for adolescents, aged thirteen (13) to eighteen (18), that is controlled by facial recognition verification via a photograph of the user.

7. MINOR VICTIM 1 stated that the defendant also communicated with her by text message, providing a screenshot of her phone, showing the defendant's phone number (XXX) XXX-5506 as a blocked phone contact.

8. NCIS performed law enforcement database checks and confirmed that telephone number (XXX) XXX-5506 was associated with the defendant.

9. MINOR VICTIM 1 stated that the defendant also communicated with her through the social media messaging application "Snapchat." She stated that the defendant last attempted to contact her through "Snapchat" in or about November 2024, and that she blocked him in the application.

10. As background, Snapchat is a social networking application that is commonly known for the messaging feature of "disappearing messages", wherein a sender can set a message to be deleted once a recipient has read the message.

11. MINOR VICTIM 1 stated she met with the defendant in person, twice during the Summer 2024. Both times, the defendant picked her up in his vehicle from close to her residence in the Eastern District of Virginia, thereafter, engaging in sexual intercourse in the backseat of his vehicle. Additionally, MINOR VICTIM 1 they performed oral sex upon one another. MINOR VICTIM 1 stated that the defendant requested to take pictures and videos of them having sexual intercourse.

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12. On December 11, 2024, NCIS identified MINOR VICTIM 2, a 12-year-old female, who resides in Texas. MINOR VICTIM 2 stated that she communicated with the defendant, and that he sent her images of his penis.

13. On January 7, 2025, NCIS arrested the defendant by federal criminal complaint, and executed a lawful search of the defendant's Apple iPhone. A review of the defendant's phone revealed messages with two suspected minors on the application Snapchat. The descriptions of the messages are below:

- a. On November 19, 2024, messaging with user ID XXXXX532, who identified herself as 16 years old the defendant tells the user, "definitely need u to ride my dick," "I bet u get wet asfff," "keep it a secret cus yk im 18 \*emoji\*," "good now show daddy more of that big ass \*eyes emoji\*," and "I luv the back viewwww I got to see that tight pussy \*emoji\*."
- b. On December 31, 2024, messaging with user ID XXXXXa9, who identified themselves as 13 years old, the defendant tells the user, "oh so u about to be 14 ?," "u in 8<sup>th</sup>." The defendant then tells the user, "Frr? Let me see sum pics," "can I send now too," "just hide ur phone from ur sister \*emoji\*" and sends a nude image of himself to the minor, exposing his penis, and asks the minor user to touch herself. The user replied, "damn your thing is up."

14. Further review of the defendant's phone revealed a video file from Snapchat user "MXXXXXX", with a listed age of 16 years old. The video depicts a pubescent female inserting a hairbrush in and out of her vagina.

15. On January 13, 2025, NCIS identified MINOR VICTIM 3, a 14-year-old female, residing in Illinois. The defendant asked MINRO VICTIM 3 for images, stating "so no titty pic for da

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birthday boy \*sad emoji\*" and "let me get more pics of youuu." MINOR VICTIM 3 stated she was 12 years old when she met the defendant on the social media messaging platform WIZZ, and also communicated via cellular phone. MINOR VICTIM 3 saved the defendant's phone number, XXX-XXX-5306, in her cellular phone as a contact.

16. As background, WIZZ is a social networking application that allows messaging, live streaming, and community features. A distinct feature of WIZZ is the "Age-appropriate engagement" feature, where the application matches users of a similar age group. Age is verified by "AI" programs using a facial recognition verification process via a photograph of the user.

17. On January 14, 2025, NCIS identified MINOR VICTIM 4, a 14-year-old female, residing in Pennsylvania. The defendant told MINOR VICTIM 4 "u need more pics of u". MINOR VICTIM 4 stated that she sent nude images to the defendant, including images of her breasts and vagina.

18. On March 6, 2025, NCIS received the return from a lawful search warrant to Snapchat for the defendant's Snapchat account dXXXXXXXXX. A review of the return revealed five (5) images containing suspected CSAM and six (6) videos containing suspected CSAM. The defendant shared images, videos, and messaged with the following Snapchat users:

- a. Snapchat user abXXXXXXXXXX, shared four (4) images of a pubescent minor in her bra and underwear.
- b. Snapchat user hXXXXXXXXX, the defendant requested the age of the user's friend and the friend's snapchat username. The defendant then asked the user to obtain nude images of the friend and share them with the defendant. In or about November 2024, the defendant sent the user multiple images of his penis.

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- c. Snapchat user LXXXXXXXXX, shared six (6) videos of a pubescent female, with her vagina, anus, and breasts exposed, inserting objects and fingers into her vagina.
- d. On or about November 13, 2024, Snapchat user a\_XXXXXXXX, the defendant identified himself as 16 years old and asked the user's age. The defendant then asks, "does that matter to you[?]", the user responded, "nah its only 2 years." The defendant then requests the user send more photographs of themselves.

19. The defendant's Apple iPhone cellular phone was Internet-capable and manufactured outside of the commonwealth of Virginia.

20. From at least April 2024 through November 2024, the defendant resided in Norfolk, Virginia, which is located in the Eastern District of Virginia.

21. The social media messaging platforms PNK, and Snapchat, necessarily require the use of the Internet. The Internet is an interconnected network of computers with which one communicates when on-line, is a network that crosses state and national borders, and is a facility of interstate and foreign commerce.

22. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States.

23. The investigation and evidence supports beyond a reasonable doubt that from in or about April 2024 through in or about November 2024, in the Eastern District of Virginia, the defendant, using a facility and means of interstate and foreign commerce, namely the Internet, did, knowingly persuade, entice, and coerce, MINOR VICTIM 1, who had not yet attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, namely a

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violation of Virginia Code Section 18.2-67.4(A) (Sexual Battery by Ruse), by falsely presenting himself as a minor to engage in sexual intercourse with MINOR VICTIM 1.

24. The acts taken by the defendant, in furtherance of the offense charged in this case, including the acts described above, were in all respects knowing and deliberate, with the specific intent to violate the law, and were not committed by mistake, accident, or other innocent reason.

25. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case, does not identify all of the persons with whom the defendant may have engaged in illegal activities, and is not intended to a full enumeration of all the facts surrounding the defendant's case.

Respectfully submitted,  
Erik S. Siebert  
United States Attorney

Date: May 8, 2025

By: 

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After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Dominic Nathaniel Torres, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

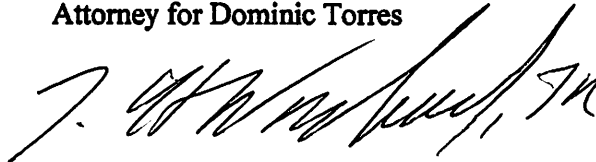


Dominic Nathaniel Torres

I am Feliz Valenzuela, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Felix Valenzuela, Esq.  
Attorney for Dominic Torres



CO-COUNSEL

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